

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

vs.

CHINA NORTHEAST PETROLEUM
HOLDINGS LIMITED; WANG HONGJUN
(a/k/a Hongjun Wang); JU GUIZHI (a/k/a
Guizhi Ju); and JIANG CHAO (a/k/a Chao
Jiang),

Defendants,

JIANG MINGFU (a/k/a Mingfu Jiang); and
SUN JISHUANG (a/k/a Jishuang Sun),

Relief Defendants.
-----X

No. 12 CV 8696 (NRB)

ECF Case

**OPPOSITION OF CHAO JIANG TO MOTION FOR LIMITED RELIEF FROM
DISCOVERY STAY AND FOR ISSUANCE OF SUMMONSES**

Defendant Chao Jiang respectfully opposes the United States Securities and Exchange Commission's ("SEC") Motion. Mr. Jiang respectfully reserves the right to assert all relevant privileges – and/or any other applicable basis – as grounds to object to any discovery propounded by the SEC should the Court lift the discovery stay. The SEC presumably has access to, and certainly has resources equal to or greater than the defendant's to find, the information it seeks, such that lifting of the discovery stay is not warranted.

Dated: August 13, 2014

Respectfully submitted,
GIBSON, DUNN & CRUTCHER LLP

By: _____ s/ Thad A. Davis

Thad A. Davis (SBN 3009628)
Michael Li-Ming Wong (Admitted *Pro Hac Vice*)
555 Mission Street, Suite 3000
San Francisco, CA 94105-0921
Telephone: 415.393.8200
Facsimile: 415.393.8306

Attorneys for CHAO JIANG